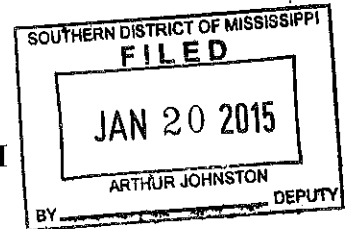


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



LATANYA K. DELOACH

PLAINTIFF

V.

CIVIL ACTION NO.: 3:15 cv 40 CWR-FKB

JACKSON PUBLIC SCHOOL DISTRICT

DEFENDANT

COMPLAINT
JURY TRIAL DEMANDED

COMES NOW the Plaintiff, Latanya K. DeLoach, by and through her counsel, Watson & Norris, PLLC, and files this action to recover damages for violations of her rights under Title VII of the Civil Rights Act of 1964, as amended, against the Defendant, Jackson Public School District. In support of this cause, the Plaintiff would show unto the Court the following facts to-wit:

PARTIES

1. The Plaintiff, Latanya K. DeLoach, is an adult male resident of Rankin County, Mississippi, residing at 302 Tyler Cove, Brandon, Mississippi 39042.
2. Defendant, Jackson Public School District, is a political subdivision of Hinds County, Mississippi, and may be served with process through its Superintendent: Dr. Cedric Gray, 662 South President Street, Jackson, MS 39201.

JURISDICTION AND VENUE

3. This action arises under Title VII of the Civil Rights Act of 1964, as amended.
4. This Court has federal question and civil rights jurisdiction for a cause of action arising under Title VII.
5. Plaintiff timely filed a Charge of Discrimination with the EEOC, a true and correct

copy of which is attached as Exhibit "A." On October 23, 2014 the EEOC issued a Notice of Right to Sue, a true and correct copy of which is attached as Exhibit "B." Plaintiff timely files this cause of action within ninety (90) days of receipt of her Notice of Right to Sue.

STATEMENT OF THE FACTS

6.. Plaintiff has hired by the Defendant on August 11, 2010, at Bailey APAC Middle School. Plaintiff was selected by Clinton Johnson, Executive Director of Athletics, to serve as the girl's basketball coach and was assigned to a PE/Health teaching position when Bailey APAC Middle School staffing was determined.

7. Plaintiff was the girl's head basketball coach during the 2012 - 2013 school year and the team won the district championship game.

8. Plaintiff was the volleyball coach during the 2012 - 2013 school year and the team won the district championship game.

9. At the end of the 2012 - 2013 school year, Plaintiff was informed that she would no long be coaching and that she was being replaced by a male with less experience than Plaintiff.

10. As such, Defendant has unlawfully discriminated against Plaintiff because of her sex, female, in violation of Title VII of the Civil Rights Act of 1964, as amended.

CAUSES OF ACTION

COUNT ONE – VIOLATION OF TITLE VII – SEX DISCRIMINATION

11. Plaintiff re-alleges and incorporates all averments set forth in paragraphs 1 through 10 above as if fully incorporated herein.

12. Plaintiff is an African-American female. Plaintiff was more than qualified for the position of basketball coach and volleyball coach. Plaintiff suffered an adverse employment action

on the basis that she was removed from the position of basketball coach and volleyball coach. Defendant replaced Plaintiff with a male who was substantially less experienced and had not achieved the level of success that Plaintiff had achieved as basketball coach and volleyball coach. As such, Defendant, acting by and through its agents and employees, has intentionally engaged in gender discrimination made unlawful by Title VII.

13. The unlawful actions of the Defendant complained of above were intentional, malicious, and taken in reckless disregard for the statutory rights of the Plaintiff.

WHEREFORE PREMISES CONSIDERED, Plaintiff respectfully prays that upon hearing of this matter by a jury, the Plaintiff be granted the following relief in an amount to be determined by the jury:

1. Reinstatement;
2. Back pay;
3. Compensatory damages;
4. Punitive damages;
5. Attorney's fees;
6. Costs and expenses; and
7. Any other relief to which she may be properly entitled.

THIS the 20th day of January, 2015.

Respectfully submitted,

LATANYA K. DELOACH, PLAINTIFF

By: 

Louis H. Watson, Jr. (MB#9053)

Nick Norris (MB#101574)

Attorneys for Plaintiff

OF COUNSEL:

WATSON & NORRIS, PLLC
1880 LAKELAND DRIVE, SUITE G
Jackson, Mississippi 39216-4972
Telephone: (601) 968-0000
Facsimile: (601) 968-0010
Email: louis@watsonnorris.com